

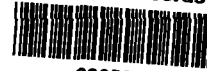
# Bain Environmental, Inc.

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6/5/01

June 5, 2001

Verneta Simon  
On-Scene Coordinator  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



226507

Dear Ms. Simon:

The Lindsey Light Company's thorium processing operations that are believed to have caused the contamination described in your letter probably started in 1915. The Brokers Building, subsequently known as the Kieffer Building, 160 E. Illinois Street, was built in 1908. There is no indication that any radioactive material from the processing operations could exist under the property at 160 E. Illinois Street. Similarly, no evidence exists that any operations associated with Lindsey Light ever occupied 160 E. Illinois Street.

On July 21, 2000 a radiological survey of 160 E. Illinois was performed. This survey found a single area of slightly elevated radiation levels attributed to brickwork. No other area in the building had any evidence of radiological anomalies. On October 18, 2000, down-hole measurements were made and samples were collected from bore-holes in and around this building. The EPA asked for, and was granted, permission to observe the measurements and sample collection. However the EPA did not send its representative on the scheduled day. Again, no radiological anomalies were found. Copies of the reports of the July 21 and the October, 18 studies have been provided to you.

Your April 4, 2001 request that we provide consent for access to 160 E. Illinois has raised a number of concerns. First, the request appears to be for open-ended access without a termination date. Is this reading correct?

Next, the second paragraph of your letter reads, "...shielding by asphalt, concrete, bricks, stored equipment, stored inventory, etc. can reduce count rates and emissions from any underlying radioactive material. Sometimes it can be reduced to such an extent that it is virtually impossible to measure until after the overlying material is removed". Does this mean that materials must be removed from the building prior to a survey?

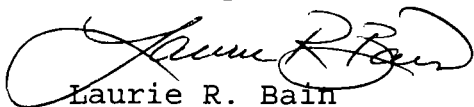
If materials remain in place, how does the EPA expect the results to differ from the survey already reported?

Finally, it is important that the following questions be answered to define the scope of any surveys that might be performed by the EPA and the applicability of the results.

1. What will be measured?
2. What instruments and methods will be used?
3. What regulations are to be applied?
4. With what standards in the regulations will the measurements be compared?
5. What is the significance of not meeting a numerical standard?
6. If the regulations and standards of another agency such as the Illinois Department of Nuclear Safety (IDNS), US NRC, or OSHA are applied, will that agency be involved in making measurements? If not, why are these agencies not involved in measurements made to determine compliance with their standards?

I await your response. If you have any questions or require additional information, please contact me at 773-728-0900.

Sincerely,



Laurie R. Bain  
President

pc: Naren Prasad, City of Chicago - Department of Environment

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